



BellSouth Telecommunications, Inc.  
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EXECUTIVE SECRETARY

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November 2, 2001

**VIA HAND DELIVERY**

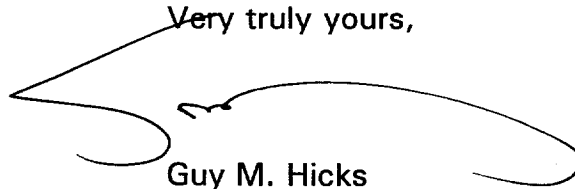
Mr. David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance  
(InterLATA) Service in Tennessee Pursuant to Section 271 of  
the Telecommunications Act of 1996*  
Docket No. 97-00309

Dear Mr. Waddell:

Enclosed are fourteen copies of BellSouth's supplemental responses to the discovery filed by Sprint and the Consumer Advocate in this proceeding. Supplemental responses to interrogatories from the Consumer Advocate containing proprietary information are being submitted today under separate cover. Copies are being provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH:ch

### CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2001, a copy of the foregoing document was served on the parties of record, via hand delivery, facsimile, overnight or US Mail, addressed as follows:

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H. LaDon Baltimore, Esquire  
Farrar & Bates  
211 Seventh Ave. N, # 320  
Nashville, TN 37219-1823  
for Qwest (fka LCI), Intermedia,  
KMC Telecom III and V

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Charles B. Welch, Esquire  
Farris, Mathews, et al.  
205 Capitol Blvd, #303  
Nashville, TN 37219  
for Time Warner and New South

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Henry Walker, Esquire  
Boult, Cummings, et al.  
P. O. Box 198062  
Nashville, TN 37219-8062  
for XO Communications, ICG,  
ACSI (e.spire), Brooks Fiber,  
SECCA and US LEC

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Dulaney O'Roark, Esquire  
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Cynthia Kinser, Esquire  
Consumer Advocate Division  
P. O. Box 20207  
Nashville, TN 37202

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14111 Capitol Blvd.  
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Guilford Thornton, Esquire  
Stokes & Bartholomew  
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Nashville, TN 37219  
for BSLD

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Gig Harbor, WA 98335  
for ASCENT

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Nanette S. Edwards, Esquire  
ITC^DeltaCom  
4092 South Memorial Parkway  
Huntsville, AL 35802

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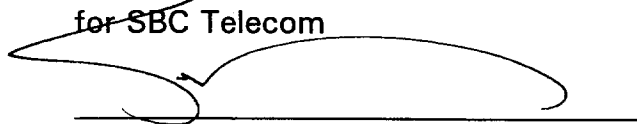
Andrew Klein, Esquire  
Kelley, Drye & Warren  
1200 19<sup>th</sup> St., NW  
Washington, DC 20036  
for KMC Telecom

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John McLaughlin, Jr.  
KMC Telecom  
1755 North Brown Road  
Lawrenceville, GA 30043

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D. Billye Sanders, Esquire  
Waller Lansden, et al.  
P. O. Box 198866  
Nashville, TN 37219-8966  
for SBC Telecom

A handwritten signature in black ink, consisting of a large, sweeping loop that starts under the word 'SBC' and extends to the right, ending under the word 'Telecom'.

**REQUEST:** Please identify and provide a copy of all BellSouth documents generated during the year 2000 and the current year to date that discuss CLEC access to LMU information in Tennessee.

**RESPONSE:** **D/CLEC Pre-Ordering and Ordering Guide For Electronic Loop Makeup (LMU) Version 2, June 4, 2001, [87 Kb]**  
**BellSouth Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guides for Manual Loop Makeup July 10, 2001-Version 1, [645 Kb]**  
**BellSouth Pre-Order Business Rules Apr 2001 - Version 11.0, [648 Kb]**  
**BellSouth Pre-Order Business Rules - Appendix Apr 2001 - Version 9.0, [375 Kb]**  
**BellSouth Pre-Order Business Rules - Data Dictionary Apr 2001 - Version 7.0, [150 Kb]**  
**<http://www.interconnection.bellsouth.com/guides/html/bpobr.html>**

REQUEST: In a spreadsheet provide BellSouth's annual profit from Tennessee operations, in millions of dollars, for each year from 1996 through 2001.

RESPONSE: The following amounts are intrastate net income from Tennessee operations for the years 1996 through June 30, 2001 in millions of dollars:

Year	Amount
1996	\$103
1997	\$147
1998	\$210
1999	\$225
2000	\$210
YTD 6/01	\$118

**REQUEST:** Provide the annual revenue received from Tennessee operations for each year from 1996 through 2001.

**RESPONSE:** The following amounts are intrastate annual revenues received from Tennessee operations for the years 1996 through June 30, 2001 in millions of dollars:

Year	Amount
1996	\$1,158
1997	\$1,197
1998	\$1,246
1999	\$1,290
2000	\$1,285
YTD 6/01	\$ 637

**REQUEST:** In a spreadsheet, provide a list of services currently offered by BellSouth in Tennessee and the current price for each service. If any service now has a price that is lower than it was in 1998, 1999 or 2000, indicate what the old price was, the year it applied to the service, and provide the ratio of the old price to the current price.

**RESPONSE:** This information is proprietary and will be provided subject to the terms of the protective order, under separate cover.



**REQUEST:** In the spreadsheet listing services now offered in Tennessee, provide the percentage of annual revenues accounted for by the service during the year 2000; for example, if a certain service provided \$50 million, then the percentage is 10%.

**RESPONSE:** This information is proprietary and will be provided subject to the terms of the protective order, under separate cover.

REQUEST: Has competition in Tennessee caused BellSouth to delay equipment purchases or discharge personnel? If the answer is 'yes' provide the dollar value of the equipment, the dollar value of the compensation that was avoided by discharging the personnel.

RESPONSE: No. Competition has not caused the delay of equipment purchases or discharge of personnel.

REQUEST: Has competition in Tennessee caused BellSouth to make equipment purchases or add personnel? If the answer is 'yes' provide the dollar value of the equipment, the dollar value of the compensation for adding the personnel.

RESPONSE: BellSouth has spent approximately \$1.6B and hired approximately 3000 employees to support the opening the local market and complying with the Telecommunications Act of 1996 and FCC Rules.

**REQUEST:** Has competition affected the price of BellSouth's common stock? If the answer is 'yes' provide any study or report prepared by the company or its consultants, to support your answer.

**RESPONSE:** BellSouth doesn't think it is feasible to isolate the impact of one variable on a company's stock price among the many market, industry and company-specific factors that could potentially be affecting that stock price. Competition is just one of these many factors. Others would include Market factors such as the state of the economy or outcome of elections; Industry factors such as regulatory uncertainty, technology changes or investor sentiment about the industry; and BellSouth specific factors such as earnings growth, competition or investor sentiment about the company or any other myriad of factors.